

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,	)
	)
Petitioner/Judgment Creditor	)
	)
vs.	)
	)
AVON CAPITAL, LLC,	)
	)
Respondent/Judgment Debtor,	)
	)
ASSET SERVICING GROUP, LLC,	)
	)
Respondent, Garnishee,	)
	)
SDM HOLDINGS, LLC,	)
	)
Respondent/Garnishee,	)
	)
and	)
	)
AVON CAPITAL, LLC, a Wyoming Limited	)
Liability Company,	)
	)
Intervenor.	)

Case No. 14-FJ-05-HE

**PETITIONER’S RESPONSE TO RECEIVER’S APPLICATION FOR ORDER  
APPROVING PAYMENT OF RECEIVER’S NOVEMBER FEES AND COSTS**

Petition Universitas Education, LLC (“Universitas”) hereby files this Response to the Receiver’s Application for Order Approving Payment of Receiver’s November Fees and Costs (“Application”). [Doc. # 342].

Universitas does not object to the fees sought by the Receiver, Ryan Leonard (“Receiver”), in his Application. Universitas contends that all the fees and costs incurred by the Receiver were necessary, proper, and reasonable. Universitas further contends that,

pursuant to Oklahoma law, these fees should be paid from funds within the receivership estate. *See ACF 2006 Corp. v. Merritt*, 2013 U.S. Dist. LEXIS 194885, at \*7-\*8 (W.D. Okla. May 10, 2013) (citing *Brown v. Bivings* 1957 OK 205, 316 P.2d 855 (1957)). As such, this Court should approve the Receiver's Application in its entirety.

Respectfully submitted,

/s/ Timothy F. Campbell  
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ATTORNEYS FOR UNIVERSITAS  
EDUCATION, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of December, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner  
Joseph H. Bocock  
Alan Rupe  
Gerald Green  
Melvin McVay  
Clayton Ketter

/s/ Timothy F. Campbell